

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO: 04 11572 JLT

SUSAN COONEY,
Plaintiff,

v.

HUMANISTIC PSYCHOLOGY
INSTITUTE, d/b/a SAYBROOK
INSTITUTE and MAUREEN O'HARA,
Individually,
Defendants.

**DEFENDANTS' MOTION TO FILE A REPLY BRIEF TO PLAINTIFF'S OPPOSITION
TO DEFENDANT MAUREEN O'HARA'S MOTION TO DISMISS, OR
ALTERNATIVELY TRANSFER, AND DEFENDANT HUMANISTIC
PSYCHOLOGY INSTITUTE'S MOTION TO TRANSFER**

Pursuant to Local Rule 7.1(B)(3), the defendants, Maureen O'Hara and Humanistic Psychology Institute d/b/a Saybrook Institute ("Saybrook Institute"), respectfully move the Court for leave to file a reply memorandum in connection with Maureen O'Hara's Motion to Dismiss or Alternatively Transfer and Saybrook Institute's Motion to Transfer, in the form submitted herewith and attached as Exhibit 1.

In support of this Motion, O'Hara and Saybrook Institute state that a reply brief is necessary to address three specific issues argued in plaintiff's Opposition to the Motion to Dismiss and Motion to Transfer. Both O'Hara and Saybrook Institute believe that such a reply will aid the Court in its decision.

Wherefore, Maureen O'Hara and Humanistic Psychology Institute d/b/a Saybrook Institute respectfully request the Court grant their Motion as such is in the interest of justice and will assist the Court in its deliberations.

Respectfully Submitted By,

Counsel for Defendants,
HUMANISTIC PSYCHOLOGY INSTITUTE,
d/b/a SAYBROOK INSTITUTE
and MAUREEN O'HARA

/s/Michael F. Aylward
/s/Grace V. Bacon

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Date: September 8, 2004